

ROBINS KAPLAN LLP
Roman M. Silberfeld, Bar No. 62783
RMSilberfeld@rkmc.com
David Martinez, Bar No. 193183
DMartinez@rkmc.com
Laura E. Nelson, Bar No. 231856
LENelson@rkmc.com
Jill S. Casselman, Bar No. 266085
JSCasselmann@rkmc.com
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: 310-552-0130
Facsimile: 310-229-5800

Attorneys for Plaintiffs
BEST BUY CO., INC.; BEST BUY PURCHASING
LLC; BEST BUY ENTERPRISE SERVICES, INC.;
BEST BUY STORES, L.P.; BESTBUY.COM,
L.L.C.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Mater Case No.: 3:07-cv-05944-SC
MDL No. 1917
Individual Case Nos.
3:11-cv-05513-SC;
3:13-cv-05264-SC

This document relates to:

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513-SC*

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al., No. 13-cv-05264-SC*

*Target Corp. v. Chunghwa Pictures Tubes,
Ltd., et al., No. 3:07-cv-05514-SC*

*Target Corp. v. Technicolor SA, et al., Case
No. 3:11-cv-05514-SC*

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,
et al., No. 11-cv-05502-SC*

*Sears, Roebuck and Co., et. al. v. Chunghwa
Picture Tubes, Ltd., et al., No. 11-cv-5514*

**DECLARATION OF JILL S.
CASSELMAN IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION *IN LIMINE*
NO. 11 TO EXCLUDE REFERENCES
TO DOCUMENTS OR BEHAVIOR
NOT IN EVIDENCE**

Judge: Hon. Samuel Conti

Sharp Electronics Corporation, et al. v. Hitachi, Ltd., et al., No. 13-cv-01173-SC

Sharp Electronics Corp., et al. v. Koninklijke Philips Electronics N.V., et al., No. 13-cv-2776 SC

ViewSonic Corporation v. Chunghwa Picture Tubes, Ltd., et al., No. 14-cv-02510

I, JILL S. CASSELMAN, declare as follows:

1. I am an attorney with the law firm of Robins Kaplan LLP, counsel for Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., and Bestbuy.com, L.L.C. (collectively “Best Buy”) in the above-captioned action currently pending in the U.S. District Court for the Northern District of California. I submit this declaration in support of Plaintiffs’¹ Opposition to Defendants’ Motion *in Limine* No. 11 to Exclude References to Documents or Behavior Not in Evidence. I have personal knowledge of the facts stated herein, and I could and would competently testify thereto if called as a witness.

2. Attached hereto as **Exhibit 1** is a true and correct copy of selections from the Expert Report of Dr. Kenneth G. Elzinga, dated April 15, 2014, and designated as “Highly Confidential.” (FILED UNDER SEAL.)

3. Attached hereto as **Exhibit 2** is a true and correct copy of selections from the Expert Rebuttal Report of Dr. Kenneth G. Elzinga, dated September 26, 2014, and designated as “Highly Confidential.” (FILED UNDER SEAL.)

4. Attached hereto as **Exhibit 3** is a true and correct copy of E-Mail Communications cited in the Elzinga Rebuttal Report, and designated as “Highly Confidential.” (FILED UNDER SEAL.)

5. Attached hereto as **Exhibit 4** is a true and correct copy of an E-Mail Communication cited by the Elzinga Rebuttal Report, and designated as “Highly Confidential.” (FILED UNDER SEAL.)

¹ For purposes to this Declaration, “Plaintiffs” refers to Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P. and Bestbuy.com, L.L.C., Alfred H. Siegel, solely in his capacity as Trustee of the Circuit City Stores, Inc. Liquidating Trust, Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc., Sears, Roebuck and Co., and Kmart Corporation, Target Corp., and ViewSonic Corp.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Transcript of the Change of Plea Hearing in *United States v. Samsung SDI Co., Ltd.*, No. 3:11-CR-00162-WHA, Dkt. No. 35, dated May 24, 2011.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the Amended Plea Agreement in *United States v. Samsung SDI Co., Ltd.*, No. 3:11-CR-00162-WHA, Dkt. No. 40-1, filed August 8, 2011.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the Notice of Limitation of Damages Pursuant to ACPERA, filed by the Chunghwa defendants on January 15, 2015 in , *In Re: Cathode Ray Tube (CRT) Antitrust Litigation*, 07-cv-05944-SC, MDL Dkt. No. 3395.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 27th day of February, 2015 in Los Angeles, California.

/s/ Jill S. Casselman

Jill S. Casselman